

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE AMERICAN INTERNATIONAL
GROUP, INC. ERISA LITIGATION II

This Document Relates To:

All Actions

:
:
:
:
:
:

Master File No.: 08-CV-5722 (LTS) (DCF)

**NOTICE OF MOTION BY PLAINTIFFS FOR
AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,
AND CASE CONTRIBUTION AWARDS TO NAMED PLAINTIFFS**

PLEASE TAKE NOTICE that, pursuant to this Court's June 5, 2015 Order and FED. R. Civ. P. Rules 23(h) and 54(d)(2), and based upon the accompanying Memorandum of Law and Joint Declaration of Co-Lead Class Counsel In Support of Plaintiffs' Motions (1) for Approval of Settlement and Plan of Allocation; And Certification of Settlement Class; and (2) for an Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards, dated August 11, 2015, Plaintiffs hereby move the Court, before the Honorable Laura Taylor Swain, United States District Court Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York, for entry of an Order in accordance with FED. R. Civ. P. 23(e) granting an award of attorneys' fees, reimbursement of expenses, and case contribution awards to the Named Plaintiffs.

A copy of the Proposed Order and Final Judgment is being submitted to the Judgments Clerk pursuant to § 18.3 of this Court's Electronic Case Filing Rules and Instructions.

Dated: August 11, 2015

Respectfully submitted,

HARWOOD FEEFFER LLP

/s/ Robert I. Harwood

Robert I. Harwood

Tanya Korkhov

488 Madison Avenue

New York, NY 10022

Telephone: (212) 935-7400

Facsimile: (212) 753-3630

Marian P. Rosner
Andrew E. Lencyk
WOLF POPPER LLP
845 Third Avenue
New York, NY 10022
Telephone: (212) 759-4600
Facsimile: (212) 486-2093

Lee Squitieri
SQUITIERI & FEARON, LLP
32 East 57th Street, 12th Floor
New York, NY 10022
Telephone: (212) 421-6492
Facsimile: (212) 421-6553
Interim Co-Lead Counsel

Lynn Lincoln Sarko
Erin M. Riley
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Telephone: (206) 623-1900
Facsimile: (206) 623-3384

Co-Lead Counsel

CERTIFICATE OF SERVICE

I certify that, on August 11, 2015, I electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which will send a notification to all counsel of record.

/s/ Craig Lowther

Craig Lowther